

BEFORE THE UNITED STATES JUDICIAL PANEL
ON MULTIDISTRICT LITIGATION

In re Tribune Fraudulent Conveyance
Litigation

MDL Docket No. _____

**PLAINTIFFS' MOTION FOR TRANSFER
FOR COORDINATED OR
CONSOLIDATED PRETRIAL
PROCEEDINGS PURSUANT TO 28
U.S.C. § 1407**

Date: To Be Set

Plaintiffs Deutsche Bank Trust Company Americas in its capacity as successor indenture trustee for a certain series of Senior Notes ("DBTCA"), Law Debenture Trust Company of New York, in its capacity as successor indenture trustee for a certain series of Senior Notes ("Law Debenture"), and Wilmington Trust Company, in its capacity as successor indenture trustee for the PHONES Notes ("Wilmington Trust" and, together with DBTCA and Law Debenture, "Plaintiffs") respectfully move, pursuant to 28 U.S.C. § 1407, the United States Judicial Panel on Multidistrict Litigation to transfer 44 actions pending in 21 different federal districts to the Southern District of New York for coordinated and consolidated pretrial proceedings, specifically to the Honorable Richard J. Holwell.

Dated: August 15, 2011

By /s/ David M. Zensky
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